

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TEMPLE TAG, INC. and	§	
TEMPLE TAG II, LTD.,	§	
	§	
Plaintiffs and Counter-Defendants,	§	
	§	
vs.	§	Civil Action No. W-10-CV-031
	§	
ALLFLEX USA, INC. and	§	
ALLFLEX NEW ZEALAND	§	
LIMITED,	§	Chief District Judge Walter S. Smith, Jr.
	§	
	§	
Defendants and Counter-Plaintiffs.	§	

**JOINT MOTION FOR ENTRY OF ORDER FOR EXCHANGE OF
INFORMATION AND NON-WAIVER OF PRIVILEGE AND PROTECTION**

Plaintiffs and Counter-Defendants Temple Tag, Inc. and Temple Tag II, Ltd. and Defendants and Counter-Plaintiffs Allflex USA, Inc. and Allflex New Zealand Limited (collectively, the “Parties”) hereby jointly move for entry of the proposed Order for Exchange of Information and Non-Waiver of Privilege and Protection (the “Proposed Order”), attached to this motion as **Exhibit A**. To facilitate the exchange of information during this litigation, the Parties have engaged in a conference which has resulted in a reasonable method of resolving possible waiver issues. The Parties state to the Court that they have made an agreement for the non-waiver of attorney-client privilege or work-product protection, in the circumstances stated in the agreement, during the exchange of documents and electronic information. We request the Court’s order as set forth in the Proposed Order. The Parties agree that the Proposed Order may be entered by the Court in this litigation without further notice or hearing. (Should the Court on its own motion wish to add to, or modify, the Proposed Order, then — and then only — do the

Parties request notice or hearing before entry of an order.) The Parties request that the Court enter the Proposed Order without further notice or hearing.

Date: May 26, 2010

Respectfully submitted,

/s/ David G. Henry

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***Attorneys for Defendants and Counter-Plaintiffs
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Limited***

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2010, a true and correct copy of this Joint Motion for Entry of Order for Exchange of Information and Non-Waiver of Privilege and Protection was served by operation of the Court's electronic filing system upon all counsel of record.

/s/ David G. Henry
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